

## REMARKS

The Applicant thanks the Examiner for noting that a Terminal Disclaimer can be filed in the present case to overcome the double patenting rejections in view of U.S. Patent No. 6,272,495. Upon resolution of the remaining grounds for rejection, and when double patenting remains as the only issue in the present case, the Applicant will consider filing a Terminal Disclaimer to overcome the double patenting issue.

With respect to the missing IDS, a copy of the Information Disclosure Statement and cover page filed July 3, 2001 in the present Application is herewith attached.

Claims 54-59, 73-78, 93, 94 and 97-106 are rejected, under 35 U.S.C. § 103, as being unpatentable in view of Gupta '258. The Applicant acknowledges and respectfully traverses the raised obviousness rejection in view of the following remarks.

As the Examiner is aware, in order to support an obviousness rejection under 35 U.S.C. § 103, based upon a single reference and what may or may not be common knowledge in the art or well known in the prior art, there must be some suggestion or motivation, either in the reference themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference teachings. The Applicant is a person of skill in the art, and after thorough review of the Gupta '258 reference is unaware of any disclosure, teaching or suggestion in the reference, or knowledge in the art which would enable a person of skill in the art to achieve the Applicant's claimed invention in view of Gupta '258. On the contrary, the and are on the contrary not well known or obvious of those of ordinary skill in the art at the time the invention was made.

In addition, the Applicant asserts that the sheer number of features as claimed in the present invention, with respect to which the Examiner has indicated it would have been obvious at the time of the invention to one of ordinary skill in the art is, in and of itself, evidence of unobviousness. The volume of claimed features which the Examiner alleges are not explicitly taught by the reference but would have been an obvious modification over the reference is in and of itself evidence of non-obviousness of the Applicant's presently claimed presently recited claim features.

Therefore, the Applicant traverses the assertions by the Examiner and requests a reference and/or affidavit in support of his/her position on what is well known in the art be set forth so that the Applicant may produce suitable contradictory evidence to the same. The Applicant respectfully requests the affidavit in view of the fact that the Applicant desires the opportunity to challenge the correctness of the numerous assertions and allegations of what is well known in the art particularly in view of the substantial number of such modifications and allegations as made by the Examiner in the present case.

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Claims 60-66, 68-72, 79-84 and 87-92 are rejected, under 35 U.S.C. § 103, as being unpatentable over Gupta '258 in view of Chuah '534. The Applicant acknowledges and respectfully traverses the raised obviousness rejection in view of the following remarks.

As the Examiner is also aware, in order to properly combine references, the references must contain some teaching or suggestion or disclosure that would lead one of ordinary skill in the art to combine the references to achieve the invention as presently claimed by the Applicant. While the Applicant notes that Gupta et al. '258 and Chuah et al. '534 are respectively drawn to interpreting or translating semi-structured or free format data, the Applicant believes that these references are complete in and of themselves and that neither one teaches, discloses nor suggests in any way that the techniques of the other be utilized so that a combination of the two would be permissible by case law.

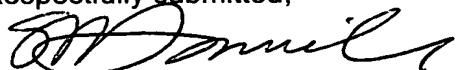
Even if the two references are combinable and this is not conceded by the Applicant, the Applicant does not believe that the references teach, disclose or suggest the specifically claimed features of the present invention. In view thereof, the Applicant respectfully requests withdrawal of the Chuah et al. '534 reference in view of Gupta et al '258.

The Applicant thanks the Examiner for indicating that claims 95 and 96 are allowable.

In view of the foregoing, it is respectfully submitted that this application is now placed in a condition for allowance. Action to that end, in the form of an early Notice of Allowance, is courteously solicited by the Applicant at this time.

In the event that there are any fee deficiencies or additional fees are payable, please charge the same or credit any overpayment to our Deposit Account (Account No. 04-0213).

Respectfully submitted,



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#### CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service, with sufficient postage, as First Class Mail in an envelope addressed to: Commissioner of Patents and Trademarks, Washington, D.C. 20231 on December 27, 2002.

By: 

Print Name: Scott A. Daniels

**VERSION WITH MARKINGS TO SHOW CHANGES MADE**

78. (~~NEWAMENDED~~) The processing system according to claim 76, wherein the text object includes a value, indicating whether an attribute - type of an element is low level in a syntactic hierarchy or high level whereby the value may be used for matching purposes when matching with other free-format data processed in accordance with this system. ◆◆

93. (~~NEWAMENDED~~) A method of enabling access to free-format data stored in a computing system, including a plurality of free-format data records, comprising the steps of storing additional data relating to semantic and syntactic information (attributes) about the data for each data record, the additional data being in the form of a text object associated with each data records, the text object including pointer means enabling access to elements of each free-format data record, the additional data being accessible by a query processing means to provide answers to queries relating to the semantic and syntactic information about the data and/or to access the data to manipulate the data. ◆◆